

DANIEL G. BOGDEN
United States Attorney
District of Nevada

ARMAND ROTH
Special Assistant United States Attorney
California Bar No. 214624

160 Spear Street, Suite 800
San Francisco, CA 94105
Telephone: (415) 977-8924
Fax: (415) 744-0134
E-Mail: Armand.Roth@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA (Las Vegas)**

DEBRA D. MCGEE,)
) Case No. 15-cv-01081-RCI-GWF

Plaintiff,

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant")

respectfully requests that the Court extend the time for Defendant to file her cross-motion to affirm, due on November 2, 2015, by 30 days, through and including December 2, 2015.

An extension of time is needed in order to prepare Defendant's motion because Defendant's counsel has an unusually heavy workload including active EEOC litigation. This request is made in good faith with no intention to unduly delay the proceedings.

Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion, on December 2, 2105.

Respectfully submitted on November 2, 2015.

DANIEL G. BOGDEN
United States Attorney

By: /s/ *Armand Roth*
ARMAND ROTH
Special Assistant United States Attorney

OF COUNSEL:

DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX

IT IS SO ORDERED:

DATED: November 3, 2015

George Foley, Jr.
HON. GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, Armand Roth, certify that the following individual was served with a copy of the
UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of service
identified below:

CM/ECF:

Leonard H Stone
Shook & Stone Chtd.
710 S. Fourth St.
Las Vegas, NV 89101-
702-385-2220
Fax: 702-384-0394
Email: lstone@shookandstone.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Marc V Kalagian
Rohlfing & Kalagian, LLP
211 E. Ocean Blvd.
Suite 420
Long Beach, CA 90802
(562) 437-7006
Fax: (562) 432-2935
Email: marc.kalagian@rksslaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Dated: November 2, 2015.

DANIEL G. BOGDEN
United States Attorney

By: /s/ Armand Roth
ARMAND ROTH
Special Assistant United States Attorney